

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEBRASKA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

UNIVERSITY OF NEBRASKA AT  
KEARNEY and BOARD OF REGENTS  
OF THE UNIVERSITY OF NEBRASKA  
Defendants.

CASE NO. 4:11CV3209

**JOINT MOTION TO APPROVE AND ENTER CONSENT ORDER**

Plaintiff United States of America and Defendants University of Nebraska at Kearney and the Board of Regents of the University of Nebraska jointly move the Court to approve the Consent Order resolving this litigation and to enter the Consent Order as a Judgment of the Court. A copy of the proposed Consent Order is attached to the Index submitted in support of this Motion.

Dated: September 3, 2015

Respectfully submitted,

<p><u>/s/ Scott P. Moore</u>  Scott Parrish Moore (NE# 20752)  Allison D. Balus (NE#23270)  of BAIRD HOLM LLP  1500 Woodmen Tower  1700 Farnam St  Omaha, NE 68102-2068  Phone: 402-344-0500  Email: <a href="mailto:spmoore@bairdholm.com">spmooore@bairdholm.com</a></p> <p>and</p> <p>Alison D. Basye (NE# 23337)  of UNIVERSITY OF NEBRASKA  Varner Hall  3835 Holdrege Street  Lincoln, NE 68583-0745  Phone: 402-472-1201  Fax: 402-472-2038  Email: <a href="mailto:abasye@nebraska.edu">abasye@nebraska.edu</a></p> <p>and</p> <p>John C. Wiltse, NSBA (NE# 16689)  Deputy General Counsel  University Of Nebraska  Varner Hall, Room 237  3835 Holdrege Street  Lincoln, Ne 68583-0745  <a href="mailto:jwiltse@nebaska.edu">jwiltse@nebaska.edu</a>  (402) 472-1201  (402) 472-2038 (facsimile)</p> <p>Attorneys for Defendants</p>	<p>STEVEN H. ROSENBAUM  Chief  SAMEENA SHINA MAJEED  Deputy Chief</p> <p><u>/s/ Elise Sandra Shore</u>  ELISE SANDRA SHORE  Georgia Bar No. 557131  ONJIL McEACHIN  New York Bar  ALAN MARTINSON  California Bar No. 258820  Trial Attorneys  Housing and Civil Enforcement Section  Civil Rights Division  U.S. Department of Justice  950 Pennsylvania Avenue NW  Northwestern Building, 7th Floor  Washington, DC 20530  Phone: (202) 305-0921  Fax: (202) 514-1116</p> <p>and</p> <p>DEBORAH R. GILG  United States Attorney</p> <p><u>/s/ Laurie A. Kelly</u>  LAURIE A. KELLY  MA Bar No. 557575  Assistant United States Attorney  United States Attorney's Office  District of Nebraska  1620 Dodge Street, Suite 1400  Omaha, NE 68102-1506  Phone: (402) 661-3700  Fax: (402) 661-3081</p> <p>Attorneys for Plaintiff</p>
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**CERTIFICATE OF SERVICE**

I certify that on September 3, 2015, I filed the foregoing document entitled Joint Motion to Approve and Enter Consent Order with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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